

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

In re Application of EDUARDO COHEN
WATKINS for an Order Pursuant to 28
U.S.C. § 1782 to Conduct Discovery for
Use in Foreign Proceedings

Plaintiff

Case Number

vs.

1:24-mc-23

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

In re Application of EDUARDO COHEN
WATKINS for an Order Pursuant to 28
U.S.C. § 1782 to Conduct Discovery for
Use in Foreign Proceedings

Plaintiff

Case Number

vs.

1:24-mc-22

Defendant

IH-32

Rev: 2014-1

Status of Earlier Filed Case:

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Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The earlier case was filed on January 12, 2024, the same day as the later filed case. There have been no court rulings.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Per Local Civil Rule 1.6(a), Petitioner Eduardo Cohen Watkins respectfully request that this action be deemed related to an action currently pending in the Southern District of New York before Judge John G. Koeltl, *Watkins v. Rothberg et al*, 1:24-mc-00022-JGK (S.D.N.Y.).

In both cases, Petitioner Eduardo Cohen Watkins submits *ex parte* applications under 28 U.S.C. §1782 in connection with a Nullity Action proceeding C/16641/2023 on one part and the Reduction Action proceeding C/18590/2023 on the other part pending in the Canton of Geneva, Switzerland. Although the respondents are not the same, the petitions concern the same events and proceedings and there is substantial factual overlap.

Signature: /s/ Shawn J. RabinDate: 01/19/2024Firm: Susman Godfrey L.L.P.